

STEPHANIE M. HINDS (CABN 154284)
United States Attorney

THOMAS A. COLTHURST (CABN 99493)
Chief, Criminal Division

YOOSUN KOH (NYBN 5245220)
Assistant United States Attorneys

450 Golden Gate Avenue, Box 36055
San Francisco, California 94102-3495
Telephone: (415) 436-7200
FAX: (415) 436-7234
Yoosun.Koh@usdoj.gov

Attorneys for United States of America

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	NO. CR 19-00486 CRB
)	
Plaintiff,)	MOTION TO DISMISS COUNT ONE OF THE
)	SUPERSEDING INDICTMENT AND PROPOSED
v.)	ORDER
)	
ROBERT ROWEN,)	
)	
Defendant.)	

On September 26, 2019, a grand jury sitting in the Northern District of California returned a two-count indictment charging Defendant Robert Rowen and Teresa Su with Conspiracy to Defraud the United States, in violation of 18 U.S.C. § 371, (Count One), and charging Rowen with Tax Evasion, in violation of 26 U.S.C. § 7201 (Count Two). Dkt. 1. On January 16, 2020, the government obtained a superseding indictment charging Rowen and Su with Conspiracy to Defraud the United States (Count One) and Tax Evasion (Count Two). Dkt. 27.

On October 13, 2021, Rowen pleaded guilty to Count Two of the superseding indictment pursuant to a Rule 11(c)(1)(A) and 11(c)(1)(B) plea agreement. Dkt. 123 (Plea Agreement). He was sentenced by this Court on January 26, 2022.

MOTION TO DISMISS COUNT ONE OF
SUPERSEDING INDICTMENT AND ~~PROPOSED~~ ORDER
CR 19-00486 CRB

1 With leave of the Court and pursuant to the government's promises in the parties' plea
2 agreement, the government moves to dismiss Count One of the captioned superseding indictment as to
3 Rowen.

4
5 DATED: February 2, 2022

Respectfully submitted,

6 STEPHANIE M. HINDS
7 United States Attorney

8 /s/
9 YOOSUN KOH
Assistant United States Attorney

10
11 **~~[PROPOSED]~~ ORDER**

12 IT IS HEREBY ORDERED that Count One of the captioned superseding indictment as to
13 Defendant Robert Rowen is dismissed.

14 IT IS SO ORDERED.

15
16 DATED: February 3, 2022

17 
18 HON. CHARLES R. BREYER
United States District Judge